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Mr. Reid P. Harvey  
U.S. Environmental Protection Agency  
Office of Atmospheric Programs (Mail Stop 6204N)  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

by e-mail to: [harvey.reid@epa.gov](mailto:harvey.reid@epa.gov)

Dear Mr. Harvey,

The Federal Register Notice of March 19, 2001 (66 FR 15470-15471) solicits input on issues to be covered in the third US National Communication to be submitted in accordance with Articles 4.2 and 12 of the United Nations Framework Convention on Climate Change (UN-FCCC). API is pleased to have the opportunity to offer suggestions on items and topics to include, and not include, in the third US National Communication.

First, and perhaps most important, the development and review schedule for the US National Communication should, if necessary, be modified to reflect the progress and outcome of the high-level climate policy review by the Bush Administration. Otherwise, the US National Communication could seriously mislead the international community regarding U.S. climate policy. While the UN-FCCC does have desired timetables for reporting, the international record of meeting these timetables is not impressive and it is far more important that the US National Communication reflect US policy than meet an arbitrary reporting timetable.

The Federal Register Notice makes several references to the Clinton/Gore Administration's "Climate Change Action Plan" initiated in 1993 and implies this plan might be covered in detail in the US National Communication. That plan had many components, not all of which were funded by Congress or fully implemented by the Clinton/Gore Administration. For a submission to the UN under the legal requirements of the Framework Convention, it is important that the US submission accurately reflect actual US accomplishments and funded programs and not cover proposed policies that were never implemented.

Chapter VI of the proposed outline covers vulnerability assessment and climate change impacts and Chapter VIII covers research and systematic observation. We strongly recommend the inclusion of one report because it represents important new scientific findings on vulnerability, and we recommend the exclusion of another report because it lacks a strong scientific foundation.

The National Research Council (NRC) recently issued its report *Under the Weather: Climate, Ecosystems, and Infectious Disease*. According to this report, it is not yet possible to determine whether global

warming will actually cause diseases to spread. This is a new scientific finding which will not be evident in the *Third Assessment Report* that is nearing completion by the Intergovernmental Panel on Climate Change. Discussion of this finding by the prestigious US National Research Council would put important new information into the UN-FCCC process and demonstrate a continuing US commitment to critical and careful scientific assessment of climate change issues.

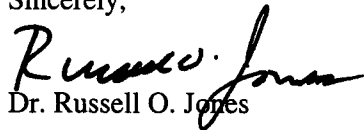
At the same time, we urge that the US national communication to the UN-FCCCC not contain or present material from the USGCRP report, *Climate Change Impacts on the United States – The Potential Consequences of Climate Variability and Change Overview*, written by the National Assessment Synthesis Team. I am submitting for the record a copy of August 11, 2000 comments by fifteen associations on this “national assessment” report. These comments provide extensive documentation of contradictory regional results and unfounded overstatements of vulnerability in the national assessment report.

The national assessment process relied on two global climate models whose regional results repeatedly contradicted one another on precipitation, temperature, soil moisture and more. As noted in the June 23, 2000 issue of *Science*, “Even the best models today can say little that’s reliable about climate change at the regional level....” A copy of the *Science* article is attached. In fact, EPA’s web site on “future climate” concludes that “Scientists currently are unable to determine which parts of the United States will become wetter or drier....” However well intentioned, this first attempt at a National Assessment pushed far beyond what science can reasonably conclude. Indeed, the internal government review resulted in major criticisms by federal agency scientists, some objecting to the “extremist/alarmist” tone of the draft report as indicated in the enclosed Wall Street Journal article (May 26, 2000). For these reasons and others expanded upon in the August submission, it is simply inappropriate to include such uncertain or even speculative material in a formal submission to the UN Framework Convention on Climate Change.

Finally, I would like to draw your attention to a new National Research Council report, *The Science of Regional and Global Change*. This report presents a useful perspective on the research agenda necessary to “guide wise public policy decisions.” In addition to reporting on the current US climate research program in the US National Communication, it may be very informative to make other nations aware of the National Research Council’s assessment of critical areas of future climate research.

It is also useful to note that this new National Research Council report reinforces the above comments on the US National Assessment report. More specifically, the NRC concludes “We still do not have sufficient knowledge or analytic capability to fully assess the magnitude of these changes or exactly when or how changes might beneficially or adversely affect particular regions of the country or sectors of the economy.”

Sincerely,



Dr. Russell O. Jones

cc: Tom Gibson, Associate Administrator Office of Policy, Economics and Innovation, EPA

Attachments

- *Science* reprint, 23 June 2000
- Comments by fifteen Associations on the draft US National Assessment
- “U.S. Study on Global Warming May Overplay Dire Side,” *Wall Street Journal*, May 26, 2000